

June 13, 2022

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall United States Courthouse
Room 705
40 Foley Square
New York, NY 10007

Re: *JPMorgan Chase Bank, National Association London Branch v. Tesla, Inc.*,
Case No. 1:21-cv-09441 (PGG)

Dear Judge Gardephe,

Plaintiff JPMorgan Chase Bank, National Association London Branch and Defendant Tesla, Inc. (collectively, the “Parties”) jointly submit this letter in accordance with Rule IV(F) of the Individual Rules of Practice of Judge Gardephe.

First: Attached hereto as Exhibit A, please find the Parties’ agreed-upon Confidentiality Stipulation and [Proposed] Protective Order; also attached is a blackline comparison showing how the Confidentiality Stipulation and [Proposed] Order differs from Your Honor’s model confidentiality order. As you will see from the blacklined document, the parties have used the core of Your Honor’s 2013 model with adaptations (i) to comport with the February 2020 changes reflected in Your Honor’s Individual Practices regarding procedures for sealing documents, and (ii) to account for the parties and issues relevant to this case.

Second: Attached hereto as Exhibit B, please find the Parties’ agreed upon Electronically Stored Information (“ESI”) [Proposed] Order.

Both of the enclosed stipulations and proposed orders have been filed with the court via the ECF system. Thank you for your attention to these matters.

Respectfully submitted,

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